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Defendant In Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SREAM, INC, a California Corporation,

Plaintiff,

v.

PANG YUN SIK A/K/A YUN SIK PANG;
RAUL PINOCHET; EMAD SAEED
KASSEM MOHSEN; and DOES 1-10
INCLUSIVE,

Defendants.

Case No. 5:16-cv-00103-JGB-KK

**STIPULATED REQUEST FOR
CONTINUANCE OF RULE 26(F)
CONFERENCE HEARING**

Initial Hearing Date: April 4, 2016

Rquested Hearing Date: April 11, 2016

1 TO THE COURT, THE INTERESTED PARTIES AND THEIR ATTORNEYS OF
 2 RECORD, PLEASE TAKE NOTICE OF THE FOLLOWING CONTINUANCE:

3 WHEREAS, on January 19, 2016, Plaintiff Sream, Inc. (“**Sream**”) filed suit against
 4 Pang Yun Sik a/k/a Yun Sik Pang¹ (“**Sik**”), Raul Pinochet² (“**Pinochet**”) and Emad Saeed
 5 Kassem Mohsen (“**Mohsen**”) [Dkt. 1];

6 WHEREAS, on February 24, 2016, this Court issued an Order Setting Rule 26(f)
 7 Scheduling Conference in the above captioned case (the “26f Conference”) to be heard on
 8 April 4, 2016 at 11:00 AM in *Riverside, California*;

9 WHEREAS, Plaintiff’s counsel has another hearing scheduled for April 4, 2016 in
 10 *Los Angeles, California* at 10:30 AM in Live Face on Web, LLC v. Major League Builders,
 11 Inc. (*See* 2:15-cv-09927-PA (AGRx) at Dkt. 13)³, which is 30 minutes before the start of
 12 the 26(f) hearing in this Action *and roughly 60 miles away*, making attendance of both
 13 hearings highly improbable;

14 WHEREAS, on March 11, 2016, Plaintiff Sream and Defendants Pinochet and
 15 Mohsen (collectively, the “**Parties**”), conducted an Early Meeting pursuant to Rule 26(f) of
 16 the Federal Rules of Civil Procedure (“FRCP”);

17 WHEREAS, Plaintiff and Defendant Mohsen⁴ jointly stipulate that the 26(f)
 18 Conference in this Action be continued by one week to April 11, 2016;

19 THEREFORE, that the Plaintiff and Defendant Mohsen collectively request that the
 20 Rule 26(f) Conference be continued from April 4, 2016 at 11:00 AM to April 11, 2016 at
 21 11:00 AM, or as soon thereafter as the Court’s schedule may allow.

23 ¹ On March 09, 2016, Plaintiff filed a Request for Entry of Default against Sik;

24 ² Pinochet failed/refused to sign the final draft of the Joint Report.

25 ³ Plaintiff’s counsel has concurrently notified the Court in Live Face On Web, LLC v.
 Major League Builders, Inc. of the potential conflict, and that in the event that the hearing
 26 in this Action is not continued, Plaintiff has requested a contingent extension of one week
 for the hearing be conducted on April 11, 2016 in that case (*See* Dkt. 14);

27 ⁴ In addition to refusing to sign the final 26(f) report, Defendant Pinochet has failed to
 28 respond to Plaintiff’s counsel’s four emails and calls over the past week to counsel’s
 repeated requests for a continuance.

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3 Dated: March 21, 2016

NEXIO, PC

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5 By: /s/ Imran F. Vakil
6 Imran F. Vakil
7 *Attorneys for Plaintiff,*
8 *Sream, Inc.*

9
10 Dated: March 21, 2016

ATHERTON & DOZIER

11 By: /s/ Bradford J. Dozier/
12 Bradford J. Dozier
13 *Attorney for Defendant*
14 *EMAD SAEED KASSEM MOHSEN*

15
16 Dated: March 21, 2016

Raul Pinochet, Defendant In Pro Per

17 By: [DECLINED TO RESPOND]
18 Raul Pinochet
19 *Defendant In Pro Per*
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